

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Christopher Janczewski, being duly sworn, depose and state as follows:

I. INTRODUCTION AND SUMMARY OF PROBABLE CAUSE

1. I make this affidavit in support of a criminal complaint charging Tokunbo Awoleye (“TOKUNBO”) of knowingly and willfully conspiring with persons named and unnamed within this complaint, including his brother coconspirator 1 (“COCONSPIRATOR 1”), to structure funds in violation of 31 U.S.C § 5324 and 18 U.S.C § 371. As set forth in greater detail below, there is probable cause to believe that, beginning sometime in or around September 2014, TOKUNBO conspired with others to structure funds, including from a fraud scheme, through domestic bank accounts, and then wired the structured funds overseas.

II. AGENT BACKGROUND

2. I am a Special Agent of the Internal Revenue Service, Criminal Investigation (“IRS-CI”) and have been so employed since September 2009. As a special agent, my responsibilities include the investigation of criminal violations of the Internal Revenue Code (Title 26, United States Code), the Money Laundering Control Act (Title 18, United States Code), the Bank Secrecy Act (Title 31, United States Code), and related offenses. Prior to my employment as a special agent, I was a revenue agent in the Examination division of the IRS for three years. My education includes a Bachelor’s Degree in Accounting from Central Michigan University in Mt. Pleasant, Michigan. As a special agent, I attended approximately 26 weeks of special agent training at the Federal Law Enforcement Training Center (“FLETC”), Glynco, Georgia, in various aspects of criminal investigations dealing specifically with criminal law, criminal tax law, money laundering, wire fraud, seizure, and various financial investigative techniques. I have training and experience in the enforcement of the laws of the United States, including the preparation, presentation, and service of arrest and search warrants. I am currently assigned to the Cyber Crimes Unit of IRS-CI, have received training in criminal schemes perpetrated via the internet and I hold a Global Information Assurance Certification of Information Security Fundamentals.

3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested arrest warrant and does not set forth all of my knowledge about this matter.

4. Based on the facts set forth in this affidavit, there is probable cause to believe that TOKUNBO conspired to structure transactions to evade reporting requirements in violation of 31 U.S.C. §§ 5324(a)(1)-(3) and 18 U.S.C. §371.

III. STRUCTURING

5. Title 31 U.S.C. § 5313 and 31 C.F.R. Chapter X § 1010.311, require any financial institution that engages with a customer in a currency transaction (i.e., a deposit or withdrawal) in excess of \$10,000.00 to report that transaction to the Financial Crimes Enforcement Network (FinCEN) on FinCEN Form 104, which is known as a Currency Transaction Report (CTR).

These regulations require that multiple transactions be treated as a single transaction if the financial institution has knowledge that they are conducted by, or on behalf of, the same person, and they result in either currency received or disbursed by the financial institution totaling more than \$10,000.00 during any one business day.

6. CTRs are used by law enforcement to uncover a wide variety of illegal activities including computer crime, tax evasion, terrorist financing, narcotics trafficking, and money laundering. Many individuals involved in these illegal activities and planning to deposit more than \$10,000.00 in cash at a bank (either at one time or over a series of transactions), or to withdraw such amounts in cash, are aware of these reporting requirements and take active steps to try to cause such institutions to fail to file CTRs with respect to their transactions. These active steps are often referred to as “structuring” and involve engaging in cash transactions in amounts of \$10,000.00 or less, in order to avoid the CTR reporting requirement. A transaction or series of transactions does not have to exceed \$10,000 at “any single financial institution on any single day in order to constitute structuring.” 31 C.F.R. § 1010.100(xx). Structuring is prohibited by Title 31 USC § 5324(a).

7. Structuring offenses can involve either structured deposits (“structuring in”) or structured withdrawals (“structuring out”). The government does not have to prove that the structured currency is derived from unlawful activity. *See United States v. MacPherson*, 424 F.3d 183, 193 (2d Cir. 2005). I am aware that, to prove the crime of structuring transactions to evade reporting

requirements, the government need not prove that an individual engaging in structuring knows that his structuring activity is illegal, *United States v. Van Allen*, 524 F.3d 814, 820 (7th Cir. 2008). Instead, the government must establish only that an individual structured or attempted to structure a transaction with a domestic financial institution for the purpose of evading the reporting requirements of Title 31 USC § 5313(a), or any regulation prescribed under that section. That an individual did not personally conduct each structuring transactions is irrelevant, as 31 C.F.R. § 1010.100(xx) provides that structuring occurs when a person, acts in conjunction with, or on behalf of, other persons for the purpose of evading the reporting requirements. Moreover, 18 U.S.C. § 371 criminalizes the agreement to conspire to structure, and as such an individual may never walk into a bank branch, but still be guilty of structuring via a conspiracy.

8. A transaction or series of transactions does not have to exceed \$10,000 at “any single financial institution on any single day in order to constitute structuring.” 31 C.F.R. § 1010.100(xx). “[T]he Government may properly charge a defendant with structuring a transaction in violation of § 5324(a)(3) by alleging he engaged in a series of currency transactions under \$10,000 for the purpose of evading the reporting requirement. The statute does not require the Government to show the defendant had in hand at one time \$10,000 or more of the funds he allegedly structured.” *United States v. Sperrazza*, 804 F.3d 1113, 1124-25 (11th Cir. 2015).

9. “[R]epeated transactions [at or] below \$10,000 are evidence of intent to structure in violation of § 5324.” *United States v. Malewicka*, 664 F.3d 1099, 1110 (7th Cir. 2011); *see also United States v. Van Allen*, 524 F.3d 814, 820-21 (7th Cir. 2008) (The sheer volume of transactions under \$10,000 can fairly lead a jury to conclude the transactions were conducted with the intent of evading the reporting requirements). “[A] pattern of structured transactions . . . may, by itself, permit a rational jury to infer that a defendant had knowledge of and the intent to evade currency reporting requirements.” *MacPherson*, 424 F.3d at 195. Furthermore, based on my training and experience, I know that many individuals often routinely deposit cash that they need to operate their trade, business, or personal ventures, but such deposits do not routinely or repeatedly consist of round numbers that approach, but never exceed, \$10,000.00. I am further aware that when individuals make multiple cash deposits that are close to, but do not exceed \$10,000.00 they are often trying to avoid triggering the filing of a CTR. In sum, such conduct indicates structuring of cash withdrawals to evade reporting requirements.

IV. FACTS ESTABLISHING PROBABLE CAUSE

A. Overview

10. This affidavit describes: a structuring scheme wherein TOKUNBO, with his brother and business partner COCONSPIRATOR 1, conspired to structure funds, including illegal proceeds of a fraud scheme, which were funneled to them by internet romance scheme victims.

11. Coconspirators of the fraud scheme employ social media and other electronic communications to direct persons, witting and unwitting, (hereinafter “money couriers”) into structuring stolen funds to TOKUNBO and COCONSPIRATOR 1. Specifically, the fraud coconspirators gain unauthorized access to email accounts and then use the hacked email accounts to send fraudulent requests to transfer money to the money couriers – who are usually found through an internet romance scheme begun on a dating website – after which the money couriers transfer the proceeds in structured amounts to TOKUNBO and COCONSPIRATOR 1. TOKUNBO, COCONSPIRATOR 1, and other coconspirators then wire transfer the stolen money to accounts outside the United States.

12. The investigation has revealed multiple separate victims of the fraud scheme, some of whom are highlighted in this affidavit.

B. Fraud Scheme

1. “Money Courier 1”

13. In October 2014, Money Courier 1 created an online dating profile on MeetMe.com – a social media website that lets users find, chat, and date other account holders. Within a week, Money Courier 1 was contacted through MeetMe.com by an account in the name of Justin Pickford (“Pickford”). Money Courier 1 and Pickford proceeded to have an active correspondence through email and text messaging. Pickford claimed he lived in California and served in the U.S. Air Force. During the course of their correspondence, Pickford professed his love for Money Courier 1 and promised to marry Money Courier 1.

14. Pickford called and texted Money Courier 1. Pickford also provided the email address justin.pickford@yahoo.com, which Money Courier 1 used to email him. During the course of their correspondence, Pickford requested Money Courier 1’s mailing address, credit score, and bank account information – all of which Money Courier 1 provided.

15. On January 9, 2015, Pickford sent a text message to Money Courier 1 indicating that he planned to mail Money Courier 1 a check for \$30,000. Pickford asked Money Courier 1 to

deposit the \$30,000 check into Money Courier 1's bank account and then to send him money as needed. He explained that Money Courier 1 should send money via Western Union to Adeshina Peckers at 211 a mailing address at a military base in Lagos, Nigeria. Pickford directed Money Courier 1 not to send any money immediately but to wait for his request.

16. This money actually came from Victim 1 and her husband's blind trust fund account with City National Bank ("the Trust"). Victim 1 and her husband share an email account. They use their email account to communicate with the trustee and make fund transfer requests. From January 20 to 22, 2015, the trustee received a series of emails from Victim 1's email account that requested a transfer of \$30,000 from the Trust. Believing these emails to be legitimate, the trustee replied with an email requesting a signed written authorization for the transfer. Soon after the trustee received a typewritten letter which authorized the requested transfer of \$30,000 and bore what appeared to be Victim 1's husband's signature. The letter directed payment to Money Courier 1 at Money Courier 1's address.

17. Pursuant to these instructions, the trustee had a \$30,000 check written from the Trust and mailed to Money Courier 1. Victim 1 and her husband later confirmed that they never approved the \$30,000 transfer, signed the faxed letter, or sent any of the emails relating to the transfer request.

18. Ultimately, Money Courier 1 received the \$30,000 check, but suspected a scam and contacted law enforcement. Money Courier 1 received multiple phone calls from someone purporting to be PICKFORD, who expressed anger because the check had not been deposited. Money Courier 1 called that number back but heard an outgoing message indicating the number belonged to a "Justin WESTBROOK."

19. On February 18, 2015, Money Courier 1 granted consent to United States Capitol Police ("USCP") Special Agent Sean Camp to use Money Courier 1's personal email and MeetMe.com accounts to communicate with Pickford, and to impersonate Money Courier 1 via text. Special Agent Camp deposited the \$30,000 check into an undercover bank account at Wells Fargo in the name of Money Courier 1.

20. On March 19, 2015, Special Agent Camp (posing as Money Courier 1), sent the following series of text messages, while in Washington, D.C., to Pickford regarding the opening of a new bank account.

| Date/Time | Sender | Text Message |
|----------------------------|--------------------------------------|---|
| 2015-03-19 09:45:30:786 | SA Camp posing as Money Courier 1 | Honey. I opened the account this morning. MY KIDS R MY #1 |
| 2015-03-19 13:14:29:505 | Pickford | That's nice which bank account do you open ? |
| 2015-03-19 13:51:46:673 | SA Camp posing as Money Courier 1 | I opened it in wells Fargo. MY KIDS R MY #1 |
| 2015-03-19 13:51:56:276 | SA Camp posing as Money Courier 1 | Deposited the check too. MY KIDS R MY #1 |

21. Later that day, Special Agent Camp, while in Washington, D.C., had a series of text messages with Pickford about the deposit of the fraudulently obtained funds. During the conversation, Special Agent Camp sent a picture of the available deposit in the undercover account to Pickford in order to prove that he made the deposit.

| Date/Time | Sender | Text Message |
|----------------------------|--------------------------------------|--|
| 2015-03-19 19:03:26:364 | SA Camp posing as Money Courier 1 | I deposited it today. MY KIDS R MY #1 |
| 2015-03-19 19:04:15:807 | Pickford | And it will get clear when ? |
| 2015-03-19 19:04:16:512 | SA Camp posing as Money Courier 1 | I sent u the confirmation. MY KIDS R MY #1 |
| 2015-03-19 19:04:52:494 | SA Camp posing as Money Courier 1 | The bank told me the fastest way 2 send it is directly to u through your bank. MY KIDS R MY #1 |
| 2015-03-19 19:05:08:202 | SA Camp posing as Money Courier 1 | Otherwise. There is a 7 day hold cause its a new account. MY KIDS R MY #1 |
| 2015-03-19 19:05:16:016 | SA Camp posing as Money Courier 1 | I sent u the pic. MY KIDS R MY #1 |
| 2015-03-19 19:06:23:598 | Pickford | Where do you send the pics and no problem there is a bank account I'm giving you to send the money too |
| 2015-03-19 19:06:34:283 | Pickford | To mail or here |
| 2015-03-19 19:07:19:750 | Pickford | No honey send it to my mail box |
| 2015-03-19 19:07:22:548 | SA Camp posing as Money Courier 1 | Ok. Let me know what account 2 send it 2. MY KIDS R MY #1 |
| 2015-03-19 19:08:46:413 | Pickford | You mean sending the pics we are talking about to my email ? |
| 2015-03-19 19:11:31:860 | Pickford | Ok I will be expecting it and pls make sure you include your pics and the kids it been long I see how you look like darling and do you see the pics of me I sent you ? |

| | | |
|----------------------------|--------------------------------------|--|
| 2015-03-19 19:11:43:841 | Pickford | Am here with you |
| 2015-03-19 19:12:19:139 | SA Camp posing as Money Courier 1 | Yes. Thank u. MY KIDS R MY #1 |
| 2015-03-19 19:12:32:262 | SA Camp posing as Money Courier 1 | I'm so glad I can make u happy. MY KIDS R MY #1 |
| 2015-03-19 19:12:59:851 | SA Camp posing as Money Courier 1 | Send me the account info so I can send that tomorrow too. MY KIDS R MY #1 |
| 2015-03-19 19:13:21:081 | Pickford | Yes you did Is just that for some days now that I didn't hear from you I was worried |
| 2015-03-19 19:13:46:363 | SA Camp posing as Money Courier 1 | No need 2 worry I am with u MY KIDS R MY #1 |

22. Your affiant notes that Special Agent Camp offered repeatedly to wire the money directly to Pickford, however, Pickford asked that the money go via a more circuitous route, which allowed for the structuring of cash deposits. As demonstrated below, Pickford instructed Special Agent Camp to break down the larger sum of fraudulently obtained proceeds and send in smaller amounts. These conversations occurred while Special Agent Camp was in Washington, D.C.

| Date/Time | Sender | Text Message |
|----------------------------|--------------------------------------|---|
| 2015-03-19 19:14:48:247 | Pickford | Wen the money is ready to cash just tell me I will send you the account and withdraw \$3.000 cash to send via western union and send the remaining one too the account am going to give you when the money is ready to cash |
| 2015-03-19 19:16:17:766 | SA Camp posing as Money Courier 1 | so u want some sent to a bank account and 3000 sent via Western union? MY KIDS R MY #1 |
| 2015-03-19 19:16:21:074 | Pickford | Do you get my message ? |
| 2015-03-19 19:16:35:105 | Pickford | Yes you get it right |
| 2015-03-19 19:16:42:421 | SA Camp posing as Money Courier 1 | Yes. MY KIDS R MY #1 |
| 2015-03-19 19:17:11:854 | SA Camp posing as Money Courier 1 | Can I send it through moneygram? Western Union wouldn't let me send it last time. MY KIDS R MY #1 |
| 2015-03-19 19:18:06:758 | SA Camp posing as Money Courier 1 | I don't want any issues like last time. MY KIDS R MY #1 |
| 2015-03-19 19:18:15:171 | Pickford | If you are sending it through money gram you will need to spilt it Hope you understand what I mean by that |

| | | |
|----------------------------|--------------------------------------|---|
| 2015-03-19 19:18:55:411 | SA Camp posing as Money Courier 1 | Can u explain? I don't want 2 mess up. MY KIDS R MY #1 |
| 2015-03-19 19:20:20:050 | SA Camp posing as Money Courier 1 | Hello? MY KIDS R MY #1 |
| 2015-03-19 19:21:01:828 | Pickford | Split is my you sharing the money into four or five places and send it one by one not at once |

23. Initially, Pickford instructed Special Agent Camp to send \$3,000 cash through Western Union and to deposit the remaining funds into an account that would be provided later. Your affiant is aware that money service businesses have a lower federal reporting requirement; that is, \$3,000, instead of the \$10,000 for banks. Based on my training and experience, the above directions to “split up” the funds into smaller amount at or below the federal reporting requirement is demonstrative of structuring.

24. On March 20, 2015, Pickford instructed Special Agent Camp, while he was in Washington, D.C., to withdraw \$15,500 in cash, to keep \$500 for himself, and split up the cash into two structured \$7,500 cash deposits into TOKUNBO’s Bank of America (“BofA”) accounts ending in 4021 and 5080. These accounts have been analyzed below in greater detail, including their attribution to TOKUNBO.

| Date/Time | Sender | Text Message |
|----------------------------|--------------------------------------|---|
| 2015-03-20 13:37:22:474 | Pickford | Ok let me give you the account number you will send the money too my love You withdraw \$15.000 cash and send it to this bank account am giving you You send \$7500 each to the two account |
| 2015-03-20 13:37:57:095 | SA Camp posing as Money Courier 1 | Ok MY KIDS R MY #1 |
| 2015-03-20 13:40:04:962 | Pickford | Name: Tokunbo Abisodun Awoleye Houston Bank of America A/c:488051524021 |
| 2015-03-20 13:40:44:680 | Pickford | That's the first account You going to withdraw cash and send \$7.500 to it |
| 2015-03-20 13:40:58:829 | SA Camp posing as Money Courier 1 | Ok babe. Do you know him? I don't want him to take your money. MY KIDS R MY #1 |
| 2015-03-20 13:41:49:687 | Pickford | Yes I do my love and this is the second account |
| 2015-03-20 13:42:21:660 | Pickford | Name: Tokunbo Abisodun Awoleye Houston Bank of America Ac: 586029305080 |
| 2015-03-20 13:42:40:328 | Pickford | His a very vice person too me honey |

25. Based on my training and experience, this direction to break down a sum of cash into sub-\$10,000 amounts before depositing the funds into another account is demonstrative of structuring. Your affiant further notes that Pickford suggested that the structured funds be deposited into TOKUNBO's accounts. Pickford stated that he knows TOKUNBO. Your affiant understands these statements to reflect that Pickford trusted TOKUNBO with the receipt of the illegal fraud proceeds.

26. Ultimately, Special Agent Camp refused to make the cash deposits and insisted that the funds be sent via wire or bank transfer. Pickford stated the accounts ending in 4021 and 5080 could not accept wires or bank transfers, which your affiant does not believe to be true. Pickford eventually sent Special Agent Camp another BofA account ending in 9861. This account was in the name of M2SYS LLC, and was established in Atlanta, GA. Pickford instructed Special Agent Camp to withdraw \$1,000.00 for himself and transfer the remaining \$29,000 to the account ending in 9861. Special Agent Camp did not send any money.

27. From within the District of Columbia on March 24, 2015, Special Agent Camp texted Pickford the online login information including the username, password, and security question for the undercover Wells Fargo bank account. Special Agent Camp subsequently reviewed search warrant returns for an email account linked to the Pickford yahoo email account. Special Agent Camp found an email dated April 9, 2015, which contained both TOKUNBO's BofA accounts ending in 4021 and 5080 and contained the login information for the undercover Wells Fargo bank account which Special Agent Camp provided to Pickford via text messaging.

2. "Money Courier 2"

28. In December 2014 Money Courier 2 came in to contact with someone named "Justin Westbrook" ("Westbrook") on the website ChristianMingle.com. This was the same name used on the voicemail greeting that Money Courier 1 heard when she called Pickford. They corresponded by telephone, email, and text message during the months that followed. Westbrook used the email justbrook53@gmail.com. Over time, Money Courier 2 came to trust Westbrook and believed they shared a romantic relationship. In February 2015, Westbrook told Money Courier 2 that he was going to send her a check to deposit into her account at Complex Community Federal Credit Union ("CCFCU").

29. Fraud Victim 2 used an email account and has a brokerage account with Wells Fargo Advisors ("WFA") in Springfield, Missouri. On February 26, 2015, the broker received an email

that purportedly came from Fraud Victim 2 and stated: “Please issue a check out from my account to the attached invoice, amount \$32,397.75 from account ending with 9106. Kindly overnight it and advice [sic] once check has been sent out.” Attached to the email was a purported invoice for the purchase of artwork from “Lou Fine Arts & Paintings” in Odessa, Texas. The document indicated that payment should be sent by check or wire to CCFCU account ending in 7000 in Odessa, TX, in Money Courier 2’s name.

30. Later on February 26, 2015, after further email communication between the broker and the hacked email of Fraud Victim 2, the bank issued a check in the amount of \$32,297.75 which was sent directly to the CCFCU account ending in 7000, in Money Courier 2’s name.

31. When a WFA employee later called to verbally confirm the transaction, Fraud Victim 2 stated that Fraud Victim 2 never approved the \$32,297.75 disbursement and the email requesting the transfer of money was fraudulent.

32. On March 2, 2015, Money Courier 2 deposited the \$32,297.75 check into her personal CCFCU account ending in 7000 and then withdrew \$9,000.00 in cash. Money Courier 2 then made additional cash withdrawals of \$19,000.00 and \$4,401.75 over the next two days. On March 3, 2015, pursuant to directions that Money Courier 2 received from Westbrook, Money Courier 2 made two structured \$9,500 cash deposits into TOKUNBO’s BofA accounts ending in 4021 and 5080 as confirmed by surveillance video footage from a BofA location in Odessa, TX.

33. By the time the fraud was discovered, it was too late for WFA to reverse the transaction and recover the stolen \$32,297.75. Money Courier 2 subsequently explained to the bank that she had been the victim of an online dating scheme and had been communicating with the online persona “Justin Westbrook” (the same name used on a voicemail greeting that Money Courier 1 called).

3. “Money Courier 3”

34. Money Courier 3 signed up for a profile on the dating website okcupid.com on October 10, 2014. Shortly after Money Courier 3 activated her account, she was sent a message on okcupid.com from another user named Alvis Cardini (“Cardini”). Cardini eventually requested via text messaging that Money Courier 3 send him \$10,000.00. On March 24, 2015, Money Courier 3 made a structured deposit of \$10,000.00 into a BofA account ending in 8817. Cardini acknowledged he received the money, but stated he needed more. On March 25, 2015, Money Courier 3 made a structured deposit of \$5,000.00 into TOKUNBO’s BofA account ending in

4021. Following this deposit, Cardini indicated that he was involved in a car accident and requested more money from Money Courier 3. On March 26, 2015, Money Courier 3 sent Cardini an additional \$3,000.00. Following the cash deposits, Cardini stopped talking to Money Courier 3. Based on my training and experience, this is consistent with a romance scheme ploy.

4. “Money Courier 4”

35. Money Courier 4 is a resident of Texas and owner of at least two bank accounts. She has a documented history of being the recipient of proceeds from five different scams, including an email hack where she received a wire transfer of \$57,930.00 in September 2014. She then wired \$30,000.00 of the funds to an individual in South Africa and attempted to wire a combined \$26,000.00 to two women in the United States that are believed to be romance victims, but the two wires were stopped by Money Courier 4’s bank.

36. Search warrant returns for justbrook53@gmail.com’s revealed three emails from Money Courier 4. The first email was from March 4, 2015, and contained a photo of a BofA receipt showing a structured deposit of \$4,530.00 into an account ending in 5080 that day at 2:22 pm. As reflected in the chart below, TOKUNBO’s BofA account ending in 5080 had a \$4,530.00 cash deposit at a Houston, Texas BofA branch on March 4, 2015, at 2:22 pm. The same day Money Courier 4’s Woodforest Bank account ending in 5709 had a \$4,530.00 cash withdrawal. Given the common denomination of funds and date stamps of the withdrawals/deposits, your affiant believes that Money Courier 4 withdrew \$4,530.00 from her bank account, and then deposited the same funds into TOKUNBO’s bank account.

37. The second email from Money Courier 4 was sent on March 12, 2015, and contained two photos. Photo one was of a domestic wire transfer request form showing a wire transfer of \$13,000.00 to a BofA account ending in 9861 held by M2SYS, LLC from Money Courier 4’s account ending in 5709. This M2SYS, LLC account was the same account Special Agent Camp was instructed to make a transfer into by Pickford (*supra* at ¶26)

38. The second photo is of a BofA receipt showing a structured deposit of \$9,000.00 in to an account ending in 4021 that day at 10:34 am. Again, reflected in the chart, TOKUNBO’s BofA account ending in 4021 had a \$9,000.00 cash deposit at a Katy, Texas BofA branch on March 12, 2015 at 10:34 am. The same day Money Courier 4’s Woodforest Bank account ending in 5709 had a \$9,000.00 cash withdrawal. Given the common denomination of funds and date stamps of

the withdrawals/deposits, your affiant believes that Money Courier 4 withdrew \$9,000 from her bank account, and then deposited the same funds into TOKUNBO's bank account.

39. Based on my training and experience, along with other evidence in this investigation, Money Courier 4 appears to be a romance scheme victim to Justin Westbrook. Money Courier 4 is used to layer ill-gotten gains from fraud victims. Specifically, Money Courier 4 received the funds, and then made wire/structured deposits into accounts, including TOKUNBO's accounts, controlled by the coconspirators.

C. Structuring Conspiracy

40. As detailed below in the summary chart, TOKUNBO was a signatory on approximately nine accounts, through which over \$1 million in cash deposits were made in less than a 12-month time frame. TOKUNBO had multiple accounts in part because banks regularly closed his accounts for suspicious transactions creating the appearance of criminal activity. Your affiant notes that the high number of bank accounts that TOKUNBO and COCONSPIRATOR 1 control is not consistent with a normal business, let alone one that is bankrupt (further described below). Typically businesses and individuals do not have so many bank accounts at so many different banks, if nothing else for convenience reasons. Based on my training and experience, I know that persons engaging in financial crimes such as structuring often have numerous bank accounts open at numerous institutions. This allows cash deposits to be made in many jurisdictions, as not all cities have branches of every bank. Furthermore, criminals are aware that their accounts frequently are shut down for suspicious transactions, so they need to have enough accounts open to allow for their illegal enterprise to continue without pause when accounts are closed.

41. Your affiant further notes that the high volume of cash transactions is suspicious. Based on my training and experience, I know that most legitimate business transactions no longer occur in cash. Additionally, a review of the accounts shows varying cash amounts, almost always in even dollar amounts. Your affiant knows of no business type which would draw in such high volume of cash in these varying denominations from such disparate geographic locations. Based on my training and experience, cash deposits in such volume and denominations demonstrate probable cause of a large-scale structuring conspiracy.

42. As sole signatory, TOKUNBO had sole access to outflow from the account. However, as with almost any bank account, inflow is not limited. That is, any person can typically make a cash, check, or wire deposit into another person's bank account. As such people from around the

country can enter a branch and deposit cash into a person's accounts. If the deposit is for less than \$10,000, no record will typically be kept indicating from whom the deposit came. From my training and experience, I know that structured cash deposits offer an attractive method by which criminals can have illegal proceeds anonymously deposited into accounts. Your affiant is further aware that criminals often engage in structuring to attempt to conceal from law enforcement their illegal activities. I also know that persons structuring cash often use third party "couriers" or "smurfs" to deposit the cash on behalf of the criminals. Often these couriers or smurfs make deposits from geographic locations that are completely divorced from the criminals controlling the flow of funds. This funneling of funds from another location is done in part to conceal the illegal activity, by making it harder to trace, and to divorce the criminals from the deposit of the funds, by using the third parties. Based on my training and experience, the financial transactions into TOKUNBO's accounts are consistent with couriers or smurfs making structured deposits from all over the country into TOKUNBO's numerous bank accounts.

| Summary of Notable Additional Accounts TOKUNBO & COCONSPIRATOR 1 For the Period January 2014 through April 2015 | | | | | | |
|---|----------------|-----------------|------------------------------------|---------------------|---------------|--------------|
| Bank | Account Ending | Signer | Period | Total Cash Deposits | Cash Deposits | D.C. Deposit |
| | | | | | | |
| BofA | 4021 | TOKUNBO | October 27, 2014 to March 30, 2015 | \$315,699.50 | 61 | |
| Details of account provided below. | | | | | | |
| | | | | | | |
| BofA | 5080 | TOKUNBO | May 12, 2014 to April 1, 2015 | \$452,657.00 | 86 | * |
| Details of account provided below. | | | | | | |
| | | | | | | |
| BofA | 3083 | COCONSPIRATOR 1 | April 3 to April 29, 2015 | \$47,025.00 | 9 | |
| Details of account provided below. | | | | | | |

| | | | | | | |
|---|------|--------------------|--|--------------|----|---|
| BofA | 9322 | COCONSPIRATOR 1 | February 13 to April 29, 2015 | \$249,890.49 | 52 | * |
| Details of account provided below. | | | | | | |
| Capital One | 6221 | TOKUNBO | May 1 to September 10, 2015 | \$100.00 | 1 | |
| This account received a \$10,000.00 check issued to TOKUNBO from LifeLine Inc – Payroll Account – DDS on May 4, 2015, with a check memo indicating it was for medical supplies. The next day \$9,800.00 was wired to TOKUNBO’s Citibank account ending in 0821. Then on May 6, 2015, Citibank account ending in 0821 wired \$9,955.00 to China. No cash deposit exceeded \$10,000.00. | | | | | | |
| Citibank | 0821 | TOKUNBO | May 1 to July 28, 2015 | \$46,500.00 | 21 | * |
| This account received two structured cash deposits in Washington, DC, one for \$8,000.00 and another for \$5,000.00. It also received structured cash deposits in New York, Maryland, and Illinois. The account received a wire transfer from TOKUNBO’s Capital One account ending in 6221 for \$9,800.00 and two wires from Coconspirator 2 totaling \$23,550.00. There were also nine international wires totaling \$132,670.00 sent to Hong Kong, China, and Dubai with memos similar to the BofA international wires. No cash deposit exceeded \$10,000.00. | | | | | | |
| Citibank | 0848 | TOKUNBO | May 1 to June 30, 2015 | \$23,700.00 | 13 | * |
| This account received a structured \$7,130.00 cash deposit in Washington, DC on May 12, 2015. Structured deposits were received in Illinois and Maryland also. No cash deposit exceeded \$10,000.00. | | | | | | |
| Citibank | 9930 | TOKUNBO | June 19 to July 31, 2015 | \$500.00 | 1 | |
| This account was mainly funded by wire transfers in, totaling \$199,712.59 from TOKUNBO, and various entities listed as “Textile Brown” and similar names. The account had eight international wires totaling \$159,324.00 to China. No cash deposit exceeded \$10,000.00. | | | | | | |

| | | | | | | |
|--|------|---------|---------------------------|----------------|-----|--|
| Wells Fargo | 1295 | TOKUNBO | March 19 to June 15, 2015 | \$28,050.00 | 5 | |
| During this period the account had five cash deposits totaling \$28,050.00. This includes a structured \$10,000.00 and a \$5,000.00 deposit made on May 4, 2015 in Evanston, Illinois. The account had ATM withdrawals in Maryland and Texas. No cash deposit exceeded \$10,000.00. | | | | | | |
| Wells Fargo | 3370 | TOKUNBO | May 5 to July 31, 2015 | \$167,034.00 | 36 | |
| This account had instances of multiple structured cash deposits of even thousand dollar increments below \$10,000.00 on the same day that in total exceeded \$10,000.00. The account received deposits in Texas and Maryland. Six cash deposits ranged from \$9,000.00 to \$10,000.00. No cash deposit exceeded \$10,000.00 | | | | | | |
| Wells Fargo | 5366 | TOKUNBO | June 18 to June 30, 2015 | \$10,100.00 | 2 | |
| The account was opened on June 18, 2015 with a \$100.00 cash deposit and the next day it received a structured deposit of \$10,000.00 cash. Three days later a wire to China was sent for \$9,950.00. No cash deposit exceeded \$10,000.00. | | | | | | |
| Wells Fargo | 7046 | TOKUNBO | March 19 to June 12, 2015 | \$108,250.00 | 22 | |
| This account had instances of multiple structured cash deposits of even thousand dollar increments below \$10,000.00 on the same day that in total exceeded \$10,000.00. For example, on April 21, 2015, four cash deposits totaling \$26,500.00 were made at multiple branches in Maryland, including an \$8,000.00 cash deposit by TOKUNBO. The account received deposits in Texas, Maryland, Illinois, and Indiana. It also sent a \$9,000.00 wire transfer to COCONSPIRATOR 1's BofA account ending in 9322. It had four international wire transfers totaling \$89,910.00, including two to Rughani Brothers, a recipient of wire transfers from COCONSPIRATOR 1's BofA account ending in 9322. Only one cash deposit exceeded \$10,000.00; that deposit for \$11,000.00 was made by a person who was subsequently arrested as part of a computer hack of a bank to illegally obtain funds. | | | | | | |
| Total | | | | \$1,449,505.99 | 101 | |

1. Bank of America - Overview

43. TOKUNBO and COCONSPIRATOR 1 are the managing director and executive director of Abbey Lincoln Limited (hereinafter “Abbey Lincoln”), according to its website located at www.abbeylincolnlimited.com. According to its website, Abbey Lincoln is a “prominent” company purporting to deal in property development, chemical imports, and oil and gas independent energy supply. Your affiant notes that these business areas typically do not involve such a high volume of such cash transactions.

44. Open source searches regarding Abbey Lincoln revealed that TOKUNBO filed a petition for what appears to be personal bankruptcy in London on April 20, 2015, which was entered on August 3, 2015.

45. The company purports to have its corporate headquarters in Lagos, Nigeria, and to have branch offices in Lagos, Nigeria, and London, United Kingdom.

- a. Abbey Lincoln lists three addresses as being associated with the business: 1) 107 445 Agege Motor Road, Oshodi, Lagos, Nigeria; 2) 163 Milkwood Road, London, SE24 OJB; and 3) 10012 Birdie Lane, Upper Marlboro, MD 20774.
- b. Regarding these locations, law enforcement has made several notable observations:
 - i. According to publically available map/satellite imagery of the aforementioned Nigeria address, the address is only 4.1 miles away from the Lagos, Nigeria, Africa address where Pickford asked Money Courier 1 to wire the fraud proceeds to him via Western Union (paragraph 14 *supra*).
 - ii. According to publically available map/satellite imagery of the aforementioned London address, the London “office” location is a row house, on what appears to be a residential street. There are no noticeable business signs in front of the building. Your affiant is aware that persons operating sham businesses often find a residential address which they claim as the location of their active business operations.
 - iii. According to publically available map/satellite imagery of the aforementioned Upper Marlboro, Maryland address, it is a single family house, in what appears to be a residential community. There do not appear to be any business signs present or noticeable in front of the property. Your affiant has learned that TOKUNBO is related to the resident of this house (Coconspirator

2, further described below) and has stayed at this house on prior visits to the United States. This residential address does not appear to be a formal place of business for a company engaging in such high volume of business.

46. Notably, numerous logins to justin.pickford@yahoo.com and to Pickford's internet telephony accounts came from IP addresses located in Lagos, Nigeria. Based on my training and experience, I am aware of a common structuring and money laundering scheme whereby a foreign individual asks people within United States to make deposits into an account controlled by the foreign individual, and then transfers that money overseas. In this manner, the foreign individual can collect money via structured deposits into United States bank accounts without having to appear personally at United States banks and without alerting the original depositors where the money will ultimately be moved. Based on my training and experience, such international money laundering often accompanies fraudulent-email schemes that appear to originate outside the United States.

47. As set forth above, TOKUNBO and COCONSPIRATOR 1 each had two bank accounts at BofA with very similar activity. They had cash deposits of less than \$10,000 that were structured into their accounts, at branches throughout the country, made by multiple individuals. The funds were then wired to entities outside of the United States to similar, if not the same, destinations in the same increments. Based on my training and experience, these accounts do not contain the typical activity one would expect to see in a business account; nor do they contain the typical account activity one would see in personal bank accounts.

48. Money Courier 1 and Money Courier 2 were directed by Pickford and Westbrook respectively to deposit the money stolen from Fraud Victim 1 and Fraud Victim 2 into the same two BofA bank accounts held by TOKUNBO, accounts ending in 4021 and 5080. The account ending in 4021 was opened on October 17, 2014, and closed on April 9, 2015. The account ending in 5080 was opened on April 27, 2012, and closed on April 6, 2015. TOKUNBO was the sole signatory on each account. Your affiant is aware that BofA sometimes requires a special passcode to authorize a transfer out of an account. This passcode is sent directly to the phone number/email associated with the owner of the account. Ultimately, BofA closed these accounts for suspected fraud.

49. From January 2014 until the accounts closed in April 2015, TOKUNBO's accounts at BofA were funded primarily by approximately 155 cash deposits worth \$768,356.50. These cash

deposits were made at multiple branch locations in Texas, Georgia, New York, Maryland, Virginia, Oregon, Massachusetts, California, Nevada, New Jersey, and Washington, D.C. The cash deposits often occurred in different jurisdictions on the same or consecutive days.

Approximately 33 out of the 155 deposits ranged from \$9,000 to \$10,000. On certain days, TOKUNBO's accounts received multiple deposits with no single deposit exceeding \$10,000.

50. TOKUNBO's account ending in 5080 was also funded by international wires from other accounts associated with him outside the United States, including 17 wires totaling \$183,550.00 from an HSBC Bank account in London, United Kingdom, held in the name of TOKUNBO, and three wires totaling \$25,455.00 from a Standard Chartered Bank account in Lagos, Nigeria, held in the name of Abbey Lincoln Limited.

51. From January 2014 until the accounts closed in April 2015, TOKUNBO's accounts ending in 4021 and 5080 together had approximately 97 outgoing wires totaling approximately \$1,445,685.51. Nearly all of these outgoing wires went to banks located outside the United States. The recipient bank accounts were located in countries such as China, Vietnam, Hong Kong, Lithuania, India, Indonesia, Thailand, and the United Kingdom. These outgoing wires were generally for about \$10,000 or \$20,000, and approximately half included memos such as "kelechi goods," "kazeem goods," "KA," "Aminat Ayinde," or some variation thereof. Your affiant was unable to find any business item or good which could be associated with these transfers.

52. The BofA accounts ending in 4021 and 5080 are personal accounts with only TOKUNBO having signature authority. Only a small portion of their funds were spent on what appear to be personal expenses. Furthermore, although the transaction memos might seem to indicate payment for goods relating to business, these accounts contain little else to suggest they were being used for a legitimate business purpose – such as other business expenses, debit or credit card revenue, or checks deposited or drawn on the accounts. Rather, the BofA accounts ending in 4021 and 5080 appear to have functioned as a conduit to collect cash throughout the United States, combine that cash with wires from foreign accounts associated with TOKUNBO, and then transfer the money to bank accounts overseas.

53. A review of TOKUNBO's account yielded a high volume of cash transactions, but only two deposits exceeded \$10,000.

- a. The first deposit, for \$11,000, was made by a person who was subsequently arrested for being associated with a computer hack of a bank that allowed the suspects to illegally obtain the bank's funds. Your affiant notes that this scheme involves a computer intrusion similar to the ones noted above.
- b. The second deposit occurred as follows: on March 30, 2015 Coconspirator 4 structured out cash withdrawals of \$10,000.00, \$2,000.00, and \$3,000.00 from two of his BofA accounts at a branch in Texas. Coconspirator 4 then deposited \$15,000.00 cash into TOKUNBO's BofA account ending in 5080. Coconspirator 4 is a Nigerian citizen living in Houston, Texas, and owner of at least six BofA bank accounts. Coconspirator 4's accounts have received cash deposits in Texas, Georgia, New Jersey, and Illinois. For the period of August 2014 to September 15, 2015, Coconspirator 4's accounts received approximately 133 cash deposits totaling \$73,400.

54. COCONSPIRATOR 1 had two BofA checking accounts ending in 9322 and 3083 that were held in the name of COCONSPIRATOR 1. The account ending in 9322 was opened on February 13, 2015, and closed on April 30, 2015. The account ending in 3083 was opened on April 3, 2015, and closed on April 30, 2015. COCONSPIRATOR 1 was the sole signatory on each account. Ultimately, BofA closed these accounts for suspected fraud. Notably, the account ending in 9322 made at least two \$1,000 direct transfers to TOKUNBO's account ending in 5080.

55. Although open for a shorter period of time, from February to April 2015, COCONSPIRATOR 1's accounts ending in 9322 and 3083 show the same pattern of financial transactions as the accounts belonging to TOKUNBO. They were funded primarily by approximately 61 cash deposits worth \$296,915.49. These cash deposits were made at multiple branch locations in Texas, Georgia, Maryland, Virginia, Oregon, Massachusetts, Nevada, Florida, and Washington, D.C. The cash deposits often occurred in different jurisdictions on the same or consecutive days. None of the cash deposits exceeded \$10,000, but 12 of them ranged from \$9,000 to \$10,000 – including seven deposits of exactly \$9,900.

56. From February to April 2015, COCONSPIRATOR 1's accounts ending in 9322 and 3083 together had approximately 27 outgoing wires totaling approximately \$457,810.00. Nearly all of these outgoing wires went to bank accounts outside the United States located in countries such as

China, Hong Kong, India, Indonesia, and South Korea. The outgoing wires were generally for about \$10,000 or \$20,000. Most of them included memos such as “kelechi goods,” “kazeem goods,” “KA,” “yetunde goods,” or some variation thereof. Your affiant again was unable to find any business item or good which could be associated with these transfers.

2. Bank of America - Deposits

57. TOKUNBO and COCONSPIRATOR 1’s four BofA accounts ending in 4021, 9322, 3083, and 5080 combined for approximately 208 cash deposits totaling approximately \$1,065,271.99 for the 16-month period of January 2014 through April 2015. Cash deposits primarily took place during the last eight months starting in September 2014.

58. There were multiple instances where deposits had the appearance of being structured not to exceed \$10,000 in order to avoid the filing of a CTR by BofA. These deposits fall into three categories:

- a. Deposits made on the same day or consecutive days that did not individually exceed \$10,000 but the aggregate did;
- b. Single deposits that ranged from \$9,000 to \$10,000; and
- c. More than one deposit on the same day that when grouped together ranged from \$9,000 to \$10,000.

Of the 208 cash deposits detailed below, 45 ranged from \$9,000.00 to \$10,000.00 and totaled \$439,426.00. From my training and experience, I know that such financial transactions are indicative of illegal structuring intended to prevent the filing of CTR’s.

| Summary of Cash Deposits TOKUNBO & COCONSPIRATOR 1 Bank of America Accounts For the Period January 2014 through April 2015 | | | | | | | |
|---|------------------------------------|---------|---------------------|-------------------------------------|-----------------|---------------|-------------|
| Date Posted | Account Ending & Holder | | Cash Deposit | Structured Same day Subtotal | Location | Branch | Time |
| 05/12/14 | 5080 | TOKUNBO | 500.00 | | Houston, TX | | |
| 09/15/14 | 5080 | TOKUNBO | 4,400.00 | | Marietta, GA | Windy Hill | 9:44 |
| 09/15/14 | 5080 | TOKUNBO | 3,000.00 | | Marietta, GA | Windy Hill | 10:28 |
| 09/15/14 | 5080 | TOKUNBO | 4,000.00 | | Marietta, GA | Windy Hill | 10:32 |
| 09/15/14 | 5080 | TOKUNBO | 2,760.00 | | Atlanta, GA | Powers Ferry | 10:42 |
| 09/15/14 | 5080 | TOKUNBO | 6,000.00 | | Atlanta, GA | Powers Ferry | 10:44 |
| 09/15/14 | 5080 | TOKUNBO | 800.00 | | Marietta, GA | | |
| 09/15/14 | 5080 | TOKUNBO | 800.00 | 21,760.00 | Marietta, GA | | |

| | | | | | | | |
|----------|------|---------|-----------|-----------|------------------|--------------------------|-------|
| 09/16/14 | 5080 | TOKUNBO | 3,120.00 | | Marietta, GA | Windy Hill | 12:56 |
| 10/20/14 | 5080 | TOKUNBO | 3,000.00 | | Pearland, TX | Silverlake | 13:02 |
| 10/20/14 | 5080 | TOKUNBO | 1,740.00 | | Houston, TX | Galleria | |
| 10/27/14 | 5080 | TOKUNBO | 5,000.00 | | Houston, TX | Galleria | 9:27 |
| 10/27/14 | 4021 | TOKUNBO | 5,000.00 | | | Houston | |
| 10/27/14 | 4021 | TOKUNBO | 4,200.00 | | Houston, TX | Houston | 9:29 |
| 10/27/14 | 5080 | TOKUNBO | 4,000.00 | 18,200.00 | Atlanta, GA | Powers Ferry | 15:48 |
| | | | | | Marietta, GA | Windy Hill | 16:02 |
| 11/14/14 | 5080 | TOKUNBO | 2,000.00 | | New York, NY | 425 Lexington | 12:00 |
| 11/14/14 | 4021 | TOKUNBO | 1,000.00 | | Atlanta, GA | Powers Ferry | 12:30 |
| 12/10/14 | 5080 | TOKUNBO | 4,000.00 | | Houston, TX | Galleria | 10:10 |
| 12/10/14 | 4021 | TOKUNBO | 9,900.00 | | Rosedale, NY | Rosedale | 14:14 |
| 12/10/14 | 5080 | TOKUNBO | 8,000.00 | 21,900.00 | Rosedale, NY | Rosedale | 14:17 |
| 12/11/14 | 5080 | TOKUNBO | 840.00 | | Jamaica, NY | Jamaica & Sutphin | 11:03 |
| 12/15/14 | 5080 | TOKUNBO | 4,000.00 | | Marietta, GA | Windy Hill | 10:32 |
| 12/17/14 | 4021 | TOKUNBO | 8,000.00 | | Brooklyn, NY | Church Ave & Ocean Ave | 17:20 |
| 12/17/14 | 5080 | TOKUNBO | 8,000.00 | 16,000.00 | Brooklyn, NY | Church Ave & Ocean Ave | 17:23 |
| 12/18/14 | 4021 | TOKUNBO | 7,300.00 | | Rosedale, NY | Rosedale | 15:20 |
| 12/22/14 | 4021 | TOKUNBO | 5,300.00 | | Houston, TX | West 8 | 9:58 |
| 12/22/14 | 4021 | TOKUNBO | 440.00 | | Marietta, GA | Windy Hill | |
| 12/26/14 | 4021 | TOKUNBO | 8,000.00 | | Houston, TX | Fondren North | 15:34 |
| 12/29/14 | 4021 | TOKUNBO | 1,000.00 | | Houston, TX | Westchase | 9:32 |
| 01/02/15 | 4021 | TOKUNBO | 10,000.00 | | White Plains, NY | Mamaroneck Ave | 15:14 |
| 01/02/15 | 4021 | TOKUNBO | 10,000.00 | | White Plains, NY | White Plains | 16:34 |
| 01/02/15 | 4021 | TOKUNBO | 10,000.00 | 30,000.00 | White Plains, NY | White Plains | 16:34 |
| 01/06/15 | 4021 | TOKUNBO | 10,000.00 | 10,000.00 | Bronx, NY | East Fordham & Valentine | 15:51 |
| 01/13/15 | 5080 | TOKUNBO | 10,000.00 | | Brooklyn, NY | Church Ave & Ocean Ave | 11:17 |
| 01/13/15 | 5080 | TOKUNBO | 9,100.00 | | Brooklyn, NY | Church Ave & Ocean Ave | 11:31 |
| 01/13/15 | 4021 | TOKUNBO | 10,000.00 | | Bronx, NY | East Fordham & Valentine | 14:05 |
| 01/13/15 | 4021 | TOKUNBO | 2,000.00 | 31,100.00 | Bronx, NY | Perry Avenue | 14:25 |
| 01/15/15 | 5080 | TOKUNBO | 3,450.00 | | Brooklyn, NY | Church Ave & Ocean Ave | 17:05 |
| 01/16/15 | 5080 | TOKUNBO | 7,000.00 | 10,450.00 | Brooklyn, NY | Church Ave & Ocean Ave | 10:17 |

| | | | | | | | |
|----------|------|-----------------|-----------|-----------|-------------------|---------------------------|-------|
| 01/23/15 | 5080 | TOKUNBO | 5,900.00 | | Brooklyn, NY | Brooklyn - Sheepshead Bay | 13:20 |
| 02/09/15 | 5080 | TOKUNBO | 10,000.00 | | Brooklyn, NY | Brooklyn - Sheepshead Bay | 14:17 |
| 02/09/15 | 4021 | TOKUNBO | 10,000.00 | | Brooklyn, NY | Brooklyn - Sheepshead Bay | 14:18 |
| 02/09/15 | 5080 | TOKUNBO | 9,500.00 | | Brooklyn, NY | Avenue U & E 21st St | 14:28 |
| 02/09/15 | 4021 | TOKUNBO | 9,000.00 | | Brooklyn, NY | Avenue U & E 21st St | 14:39 |
| 02/09/15 | 5080 | TOKUNBO | 10,000.00 | 48,500.00 | Brooklyn, NY | 1502 Kings Hwy | 14:47 |
| 02/10/15 | 4021 | TOKUNBO | 1,500.00 | | Brooklyn, NY | Brooklyn - Sheepshead Bay | 15:27 |
| 02/13/15 | 5080 | TOKUNBO | 5,000.00 | | Silver Spring, MD | White Oak | 15:12 |
| 02/13/15 | 5080 | TOKUNBO | 6,200.00 | | Silver Spring, MD | White Oak | 17:25 |
| 02/13/15 | 9322 | COCONSPIRATOR 1 | 25.00 | 11,225.00 | Silver Spring, MD | Downtown Silver Spring | |
| 02/17/15 | 9322 | COCONSPIRATOR 1 | 100.00 | | Silver Spring, MD | White Oak | |
| 02/18/15 | 4021 | TOKUNBO | 10,000.00 | | Silver Spring, MD | Colesville | 14:52 |
| 02/18/15 | 5080 | TOKUNBO | 9,900.00 | 19,900.00 | Silver Spring, MD | Colesville | 16:15 |
| 02/19/15 | 5080 | TOKUNBO | 4,200.00 | | Visalia, CA | Visalia | 9:01 |
| 02/19/15 | 5080 | TOKUNBO | 3,600.00 | | Houston, TX | Stadium | 10:28 |
| 02/20/15 | 5080 | TOKUNBO | 1,770.00 | 9,570.00 | Houston, TX | West Oaks | 10:12 |
| 02/23/15 | 5080 | TOKUNBO | 2,550.00 | | Westfield, NJ | Westfield | 10:48 |
| 02/23/15 | 4021 | TOKUNBO | 4,350.00 | | Brooklyn, NY | Brooklyn - Sheepshead Bay | 11:58 |
| 02/23/15 | 9322 | COCONSPIRATOR 1 | 500.00 | | Marietta, GA | Windy Hill | |
| 02/24/15 | 5080 | TOKUNBO | 2,040.00 | | Houston, TX | Galleria Houston | 11:25 |
| 02/24/15 | 5080 | TOKUNBO | 2,000.00 | 11,440.00 | Bronx, NY | Co-op City | 11:30 |
| 02/25/15 | 5080 | TOKUNBO | 5,400.00 | | Visalia, CA | Mooney-Beech | 9:35 |
| 02/26/15 | 4021 | TOKUNBO | 10,000.00 | 10,000.00 | Brooklyn, NY | Brooklyn - Sheepshead Bay | 15:33 |
| 03/02/15 | 5080 | TOKUNBO | 9,000.00 | 9,000.00 | Odessa, TX | Odessa | 14:39 |

| | | | | | | | |
|----------|------|--------------------|-----------|-----------|-----------------------|---------------------------------|-------|
| 03/03/15 | 5080 | TOKUNBO | 8,800.00 | | Richmond, VA | Short Pump | 9:16 |
| 03/03/15 | 5080 | TOKUNBO | 9,500.00 | | Odessa, TX | Odessa | 9:33 |
| 03/03/15 | 4021 | TOKUNBO | 9,500.00 | | Odessa, TX | Odessa | 9:34 |
| 03/03/15 | 4021 | TOKUNBO | 10,000.00 | | Brooklyn, NY | Brooklyn - Sheepshead Bay | 11:45 |
| 03/03/15 | 4021 | TOKUNBO | 10,000.00 | | Brooklyn, NY | Church Ave & Ocean Ave | 12:23 |
| 03/03/15 | 4021 | TOKUNBO | 8,000.00 | 59,600.00 | Brooklyn, NY | Brighton Beach | 15:47 |
| 03/03/15 | 4021 | TOKUNBO | 3,800.00 | | Brooklyn, NY | 1580 Flatbush | 17:04 |
| 03/04/15 | 5080 | TOKUNBO | 4,530.00 | 10,380.00 | Houston, TX | Copperfield | 14:22 |
| 03/04/15 | 5080 | TOKUNBO | 5,000.00 | | Duncanville, TX | Cedar Ridge | 15:49 |
| 03/04/15 | 9322 | COCONSPIRATOR 1 | 350.00 | | | | |
| 03/04/15 | 9322 | COCONSPIRATOR 1 | 500.00 | | | | |
| 03/05/15 | 4021 | TOKUNBO | 5,000.00 | | Midland, TX | Garfield | 14:34 |
| 03/06/15 | 5080 | TOKUNBO | 10,000.00 | 20,000.00 | Brooklyn, NY | Brooklyn - Sheepshead Bay | 13:23 |
| 03/06/15 | 5080 | TOKUNBO | 10,000.00 | | Brooklyn, NY | Brighton Beach | 13:51 |
| 03/09/15 | 5080 | TOKUNBO | 4,400.00 | 11,900.00 | Houston, TX | Westwood | 10:51 |
| 03/09/15 | 5080 | TOKUNBO | 2,500.00 | | Mitchellville, MD | Lake Arbor | 12:00 |
| 03/09/15 | 4021 | TOKUNBO | 3,000.00 | | Dallas, TX | Forest Meadow | 15:01 |
| 03/09/15 | 5080 | TOKUNBO | 2,000.00 | | Upper Marlboro, MD | Kettering | 16:57 |
| 03/10/15 | 5080 | TOKUNBO | 3,500.00 | 21,900.00 | Tulare, CA | Tulare | 9:30 |
| 03/10/15 | 4021 | TOKUNBO | 6,000.00 | | Pflugerville, TX | Pflugers Crossing | 11:23 |
| 03/10/15 | 5080 | TOKUNBO | 6,000.00 | | Pflugerville, TX | Pflugers Crossing | 11:28 |
| 03/10/15 | 4021 | TOKUNBO | 6,400.00 | | Dallas, TX | Buckner Commons | 12:06 |
| 03/11/15 | 5080 | TOKUNBO | 10,000.00 | 30,000.00 | Brooklyn, NY | Brighton Beach | 15:30 |
| 03/11/15 | 5080 | TOKUNBO | 10,000.00 | | Brooklyn, NY | 1580 Flatbush | 16:41 |
| 03/11/15 | 5080 | TOKUNBO | 10,000.00 | | Brooklyn, NY | Church Ave & Ocean Ave | 17:02 |
| 03/12/15 | 4021 | TOKUNBO | 9,000.00 | 9,000.00 | Katy, TX | Katy Station | 10:34 |
| 03/16/15 | 5080 | TOKUNBO | 4,500.00 | 20,036.50 | Washington, DC | Vermont Avenue | 9:49 |
| 03/16/15 | 5080 | TOKUNBO | 7,500.00 | | Houston, TX | Alief | 9:57 |
| 03/16/15 | 4021 | TOKUNBO | 7,500.00 | | Houston, TX | Alief | 9:59 |
| 03/16/15 | 4021 | TOKUNBO | 536.50 | | Hampton, VA | Fox Hill | 14:17 |
| 03/17/15 | 5080 | TOKUNBO | 5,000.00 | | Houston, TX | Westwood | 12:04 |
| 03/17/15 | 5080 | TOKUNBO | 10,000.00 | | Brooklyn, NY | Avenue U & E 21st St | 13:38 |

| | | | | | | | |
|----------|------|--------------------|-----------|-----------|--------------------|-------------------|-------|
| 03/17/15 | 5080 | TOKUNBO | 8,720.00 | | Greenbelt, MD | Beltway Plaza | 16:11 |
| 03/17/15 | 5080 | TOKUNBO | 10,000.00 | | Bronx, NY | Allerton Avenue | 16:56 |
| 03/17/15 | 5080 | TOKUNBO | 3,500.00 | 37,220.00 | Houston, TX | Tanglewood | 16:59 |
| 03/18/15 | 4021 | TOKUNBO | 2,000.00 | | Dallas, TX | Forest Meadow | 10:07 |
| 03/19/15 | 4021 | TOKUNBO | 4,300.00 | | Dallas, TX | Forest Meadow | 14:27 |
| 03/19/15 | 4021 | TOKUNBO | 2,324.00 | | Dorchester, MA | South Bay | 14:50 |
| 03/19/15 | 5080 | TOKUNBO | 2,000.00 | | Mitchellville, MD | Lake Arbor | 14:57 |
| 03/19/15 | 4021 | TOKUNBO | 5,230.00 | 15,854.00 | Richardson, TX | Centennial | 16:40 |
| 03/20/15 | 5080 | TOKUNBO | 7,000.00 | | Jessup, MD | Waterloo | 9:54 |
| 03/20/15 | 5080 | TOKUNBO | 3,900.00 | | Columbia, MD | Kings Contrivance | 10:23 |
| 03/20/15 | 5080 | TOKUNBO | 3,500.00 | | Silver Spring, MD | White Oak | 10:44 |
| 03/20/15 | 5080 | TOKUNBO | 15,000.00 | | Pflugerville, TX | Pfluger Crossing | 11:47 |
| 03/20/15 | 5080 | TOKUNBO | 4,000.00 | | Mitchellville, MD | Lake Arbor | 11:54 |
| 03/20/15 | 4021 | TOKUNBO | 2,250.00 | | Hampton, VA | Fox Hill | 15:05 |
| 03/20/15 | 4021 | TOKUNBO | 5,000.00 | | Brooklyn, NY | Flatbush | 15:16 |
| 03/20/15 | 5080 | TOKUNBO | 907.00 | | Dorchester, MA | Grove Hall | 15:43 |
| 03/20/15 | 9322 | COCONSPIRATOR 1 | 1,000.00 | 42,557.00 | Silver Spring, MD | White Oak | |
| 03/23/15 | 4021 | TOKUNBO | 4,300.00 | | Lawrence, KS | Lawrence | 9:03 |
| 03/23/15 | 4021 | TOKUNBO | 4,983.00 | | Dorchester, MA | Grove Hall | 13:26 |
| 03/23/15 | 4021 | TOKUNBO | 3,500.00 | | Chicago, IL | Wacker/Monroe | 13:35 |
| 03/23/15 | 5080 | TOKUNBO | 5,000.00 | | Richardson, TX | Centennial | 14:17 |
| 03/23/15 | 4021 | TOKUNBO | 4,000.00 | | Dallas, TX | Forest Meadow | 14:36 |
| 03/23/15 | 4021 | TOKUNBO | 400.00 | | Falls Church, VA | Yorktowne | 15:37 |
| 03/23/15 | 4021 | TOKUNBO | 5,000.00 | | Brooklyn, NY | Flatbush | 15:59 |
| 03/23/15 | 5080 | TOKUNBO | 4,500.00 | | Upper Marlboro, MD | Kettering | 16:29 |
| 03/23/15 | 4021 | TOKUNBO | 4,500.00 | 36,183.00 | Mitchellville, MD | Lake Arbor | 16:46 |
| 03/24/15 | 5080 | TOKUNBO | 5,000.00 | | Brooklyn, NY | Flatbush | 9:06 |
| 03/24/15 | 5080 | TOKUNBO | 2,500.00 | | Baltimore, MD | Rockdale | 13:54 |
| 03/24/15 | 5080 | TOKUNBO | 2,500.00 | | Randallstown, MD | Randallstown | 14:23 |
| 03/24/15 | 4021 | TOKUNBO | 2,480.00 | | Randallstown, MD | Randallstown | 14:26 |
| 03/24/15 | 4021 | TOKUNBO | 2,020.00 | | Baltimore, MD | Westview | 15:36 |
| 03/24/15 | 4021 | TOKUNBO | 7,000.00 | | Carson City, NV | Carson City | 16:03 |
| 03/24/15 | 5080 | TOKUNBO | 5,000.00 | | Carson City, NV | Carson City | 16:06 |
| 03/24/15 | 4021 | TOKUNBO | 9,566.00 | | Reno, NV | 7th & McCarran | 16:34 |
| 03/24/15 | 5080 | TOKUNBO | 680.00 | | Dorchester, MA | South Bay | 16:37 |
| 03/24/15 | 5080 | TOKUNBO | 1,220.00 | | Baltimore, MD | Westview | |
| 03/24/15 | 5080 | TOKUNBO | 1,280.00 | | Baltimore, MD | Westview | |
| 03/24/15 | 5080 | TOKUNBO | 2,500.00 | | Baltimore, MD | Westview | |

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|----------|------|--------------------|----------|-----------|-----------------------|----------------------------------|-------|
| 03/24/15 | 9322 | COCONSPIRATOR 1 | 2,020.00 | | Silver Spring, MD | White Oak | |
| 03/24/15 | 4021 | TOKUNBO | 2,500.00 | | Baltimore, MD | Rockdale | |
| 03/24/15 | 4021 | TOKUNBO | 1,940.00 | | Baltimore, MD | Westview | |
| 03/24/15 | 4021 | TOKUNBO | 1,040.00 | 49,246.00 | Baltimore, MD | Westview | |
| 03/25/15 | 4021 | TOKUNBO | 5,000.00 | | Encinitas, CA | Rancho Encinitas | 10:26 |
| 03/25/15 | 5080 | TOKUNBO | 1,400.00 | | Tulare, CA | Tulare | 10:41 |
| 03/25/15 | 4021 | TOKUNBO | 5,000.00 | | Houston, TX | Gessner & Bellfort | 12:53 |
| 03/25/15 | 5080 | TOKUNBO | 4,500.00 | 15,900.00 | Baltimore, MD | Kettering | 14:11 |
| 03/26/15 | 5080 | TOKUNBO | 3,150.00 | | Dallas, TX | Forest Meadow | 12:32 |
| 03/26/15 | 5080 | TOKUNBO | 8,000.00 | | Atlanta, GA | Dunwoody Place | 13:28 |
| 03/26/15 | 4021 | TOKUNBO | 400.00 | 11,550.00 | Falls Church, VA | Yorktowne | 14:32 |
| 03/27/15 | 5080 | TOKUNBO | 7,500.00 | | Richardson, TX | Centennial | 10:39 |
| 03/27/15 | 5080 | TOKUNBO | 4,300.00 | | Dallas, TX | Forest Meadow | 11:02 |
| 03/27/15 | 5080 | TOKUNBO | 9,000.00 | | Austin, TX | I-35/ Parmer | 12:02 |
| 03/27/15 | 4021 | TOKUNBO | 2,050.00 | 22,850.00 | Upper Marlboro, MD | Kettering | 18:00 |
| 03/30/15 | 4021 | TOKUNBO | 430.00 | | Little Rock, AR | Bowman | 11:02 |
| 03/30/15 | 5080 | TOKUNBO | 9,500.00 | | Portland, OR | Financial Center BC | 15:00 |
| 03/30/15 | 4021 | TOKUNBO | 760.00 | | Woodbridge, VA | Prince William Pkwy | 15:24 |
| 03/30/15 | 4021 | TOKUNBO | 2,000.00 | 12,690.00 | Silver Spring, MD | White Oak | 16:37 |
| 03/31/15 | 5080 | TOKUNBO | 9,960.00 | | Beaverton, OR | Beaverton Main Banking Center | 14:36 |
| 03/31/15 | 9322 | COCONSPIRATOR 1 | 300.00 | 10,260.00 | Silver Spring, MD | White Oak | |
| 04/01/15 | 5080 | TOKUNBO | 840.00 | | Dorchester, MA | South Bay | 11:25 |
| 04/02/15 | 9322 | COCONSPIRATOR 1 | 4,000.00 | | Silver Spring, MD | Colesville | |
| 04/02/15 | 9322 | COCONSPIRATOR 1 | 4,000.00 | | Silver Spring, MD | Colesville | |
| 04/02/15 | 9322 | COCONSPIRATOR 1 | 9,700.00 | | | | |
| 04/03/15 | 3083 | COCONSPIRATOR 1 | 25.00 | | | | |
| 04/03/15 | 9322 | COCONSPIRATOR 1 | 2,380.00 | | Silver Spring, MD | White Oak | |
| 04/03/15 | 9322 | COCONSPIRATOR 1 | 3,820.00 | 23,925.00 | Silver Spring, MD | White Oak | |
| 04/06/15 | 9322 | COCONSPIRATOR 1 | 4,750.00 | | | | |
| 04/06/15 | 9322 | COCONSPIRATOR 1 | 4,800.00 | 9,550.00 | | | |

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|----------|------|--------------------|-----------|-----------|--------------------------|----------------------------------|-------|
| 04/09/15 | 9322 | COCONSPIRATOR 1 | 9,900.00 | 9,900.00 | | | |
| 04/10/15 | 9322 | COCONSPIRATOR 1 | 9,900.00 | 9,900.00 | | | |
| 04/13/15 | 9322 | COCONSPIRATOR 1 | 580.00 | | Dorchester, MA | South Bay | 13:45 |
| 04/13/15 | 9322 | COCONSPIRATOR 1 | 9,900.00 | | Beaverton, OR | Beaverton Main Banking Center | 15:11 |
| 04/13/15 | 9322 | COCONSPIRATOR 1 | 9,500.00 | 19,980.00 | Riverdale, MD | East Riverdale | 17:41 |
| 04/14/15 | 9322 | COCONSPIRATOR 1 | 9,900.00 | | Portland, OR | MLK Jr. | 14:00 |
| 04/14/15 | 9322 | COCONSPIRATOR 1 | 5,000.00 | | Pflugerville, TX | Pflugger Crossing | 14:11 |
| 04/14/15 | 9322 | COCONSPIRATOR 1 | 5,000.00 | 19,900.00 | Austin, TX | I-35/Parmer | 14:38 |
| 04/15/15 | 9322 | COCONSPIRATOR 1 | 5,000.00 | | | | |
| 04/15/15 | 9322 | COCONSPIRATOR 1 | 5,000.00 | 10,000.00 | | | |
| 04/16/15 | 9322 | COCONSPIRATOR 1 | 6,100.00 | | Altamonte Springs, FL | Altamonte Springs | 10:01 |
| 04/16/15 | 9322 | COCONSPIRATOR 1 | 50.00 | | Seabrook, MD | Seabrook | 10:55 |
| 04/16/15 | 9322 | COCONSPIRATOR 1 | 5,000.00 | | Dorchester, MA | South Bay | 12:37 |
| 04/16/15 | 9322 | COCONSPIRATOR 1 | 5,000.00 | | Dorchester, MA | South Bay | 12:37 |
| 04/16/15 | 9322 | COCONSPIRATOR 1 | 9,900.00 | 26,050.00 | Beaverton, OR | Cedar Hills Crossing | 15:28 |
| 04/17/15 | 9322 | COCONSPIRATOR 1 | 5,350.00 | | | | |
| 04/20/15 | 9322 | COCONSPIRATOR 1 | 9,900.00 | | Annapolis, MD | Parole | 10:41 |
| 04/20/15 | 9322 | COCONSPIRATOR 1 | 6,000.00 | | Baltimore, MD | Centerpoint | 12:22 |
| 04/20/15 | 9322 | COCONSPIRATOR 1 | 10,000.00 | | Hyattsville, MD | Landover Hills | 17:13 |
| 04/20/15 | 3083 | COCONSPIRATOR 1 | 9,500.00 | | | | |
| 04/20/15 | 3083 | COCONSPIRATOR 1 | 9,900.00 | 45,300.00 | | | |
| 04/21/15 | 9322 | COCONSPIRATOR 1 | 5,000.00 | | Hyattsville, MD | Landover Hills | 14:10 |
| 04/21/15 | 3083 | COCONSPIRATOR 1 | 6,500.00 | | Hyattsville, MD | Landover Hills | 14:10 |
| 04/21/15 | 9322 | COCONSPIRATOR 1 | 7,000.00 | | Leesburg, VA | Battlefield Pkwy | 15:25 |
| 04/21/15 | 3083 | COCONSPIRATOR 1 | 5,000.00 | 23,500.00 | Baltimore, MD | White Marsh | 16:19 |

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|---------------|------|--------------------|-----------------------|-----------|----------------------|-------------------------|-------|
| 04/22/15 | 9322 | COCONSPIRATOR 1 | 2,500.00 | | | | |
| 04/22/15 | 9322 | COCONSPIRATOR 1 | 7,000.00 | 9,500.00 | | | |
| 04/23/15 | 9322 | COCONSPIRATOR 1 | 730.00 | | Silver Spring, MD | White Oak | 8:12 |
| 04/23/15 | 9322 | COCONSPIRATOR 1 | 800.00 | | Silver Spring, MD | White Oak | 8:12 |
| 04/23/15 | 9322 | COCONSPIRATOR 1 | 2,550.00 | | Silver Spring, MD | White Oak | 8:12 |
| 04/23/15 | 9322 | COCONSPIRATOR 1 | 8,000.00 | | Hyattsville, MD | Landover Hills | 14:27 |
| 04/23/15 | 3083 | COCONSPIRATOR 1 | 1,800.00 | 13,880.00 | Greenbelt, MD | Hanover Pkwy | |
| 04/24/15 | 9322 | COCONSPIRATOR 1 | 5,000.00 | | Mitchellville, MD | Lake Arbor | 11:57 |
| 04/24/15 | 9322 | COCONSPIRATOR 1 | 2,585.49 | | Petersburg, VA | Crater Road | 12:16 |
| 04/24/15 | 9322 | COCONSPIRATOR 1 | 300.00 | | Washington, DC | Anacostia | 14:16 |
| 04/24/15 | 9322 | COCONSPIRATOR 1 | 8,000.00 | | Lindale, TX | Lindale | 15:15 |
| 04/24/15 | 9322 | COCONSPIRATOR 1 | 7,000.00 | 22,885.49 | Lindale, TX | Lindale | 15:22 |
| 04/27/15 | 9322 | COCONSPIRATOR 1 | 6,500.00 | | Houston, TX | West 8 | 9:17 |
| 04/27/15 | 9322 | COCONSPIRATOR 1 | 4,000.00 | | Sparks, NV | Prater / McCarran | 10:48 |
| 04/27/15 | 9322 | COCONSPIRATOR 1 | 4,200.00 | | Houston, TX | Highway 6/ Bissonnet | 12:12 |
| 04/27/15 | 9322 | COCONSPIRATOR 1 | 9,000.00 | 23,700.00 | Hyattsville, MD | Landover Hills | 17:15 |
| 04/28/15 | 3083 | COCONSPIRATOR 1 | 4,700.00 | | | | |
| 04/28/15 | 3083 | COCONSPIRATOR 1 | 4,800.00 | 9,500.00 | | | |
| 04/29/15 | 3083 | COCONSPIRATOR 1 | 4,800.00 | | | | |
| 04/29/15 | 9322 | COCONSPIRATOR 1 | 4,500.00 | 9,300.00 | | | |
| Totals | | | \$1,065,271.99 | | | | |

3. Structuring Directly by TOKUNBO and COCONSPIRATOR 1

59. Travel history shows TOKUNBO arrived in the U.S. on April 19, 2015, and COCONSPIRATOR 1 arrived in the U.S. on April 22, 2015. They both departed the U.S. on the same flight from Dulles International Airport on April 25, 2015. During their time in the U.S. together:

- a. On April 21, 2015, TOKUNBO made a \$6,500.00 cash deposit into COCONSPIRATOR 1's BofA account ending in 3083.
- b. On April 23, 2015, TOKUNBO made a \$730.00 cash deposit into COCONSPIRATOR 1's BofA account ending in 9322 while standing at a Silver Spring, MD BofA ATM. At this same time, COCONSPIRATOR 1 was in a car at the same branch but at a different ATM making a \$800.00 cash deposit and a \$2,550.00 cash deposit into the same account as TOKUNBO. Later this day, at approximately 2:27 pm, COCONSPIRATOR 1 made an \$8,000.00 cash deposit into COCONSPIRATOR 1's BofA account ending in 9322 at a different BofA in Hyattsville, MD.
- c. Based on my training and experience, these cash deposits, which were close in time and at different ATM/branch locations is consistent with the practice of structuring.

60. Law enforcement surveilled TOKUNBO during a visit to the United States from London on July 27 to July 30, 2015.

- a. On July 28, 2015, TOKUNBO entered a Wells Fargo branch in Landover, MD. While at the branch, he deposited \$8,000.00 in cash into his Wells Fargo account ending in 5366. He also completed a wire transfer for \$24,900.00 to Ye Hang International in China with the memo "Abbey Goods" from his account ending in 9930. He also withdrew \$2,000.00 in cash.
- b. From Wells Fargo, TOKUNBO then went to a Citibank branch in Laurel, MD, and deposited \$800.00 cash in to his Citibank account ending in 0821.
- c. From Citibank, TOKUNBO next went to a second Wells Fargo branch in Laurel, Maryland. While in the second Wells Fargo branch, TOKUNBO deposited \$5,100.00 cash into his same account as earlier, the account ending in 5366. TOKUNBO then completed a wire transfer for \$14,955.00 to Hong Kong Shilian Trade Ltd.

d. From Wells Fargo, TOKUNBO next went to a second Capital One branch in Largo, Maryland. While in Capital One, TOKUNBO opened two bank accounts in the name of Abbey Lincoln LLC, using Coconspirator 2's (further identified below) 10012 Birdie Lane address. TOKUNBO deposited \$260.00 in cash into the first new account ending in 3022 and \$300.00 in cash into the second new account ending in 2068. Notably, that evening, username "ABBEYLINCOLN" was used to enroll in online banking with Capitol One. This same username logged in from Croydon, Great Britain on August 1, 2015, also, the day after TOKUNBO departed the United States on a return flight to Great Britain.

61. On July 29, 2015, TOKUNBO drove to New York. He made various stops while there, including at Flatbush Avenue in Brooklyn. Notably, TOKUNBO's BofA accounts had 28 cash deposits made in Brooklyn, including 5 at the Flatbush branch.

62. On July 30, 2015, TOKUNBO traveled to a residence on 131st Avenue, Rosedale, NY. TOKUNBO left the United States in the evening from JFK Airport. A trash pull from TOKUNBO's hotel room revealed a torn up outgoing wire transfer request for the previously mentioned \$14,955.00 wire on July 27th to Hong Kong Shilian Trade Ltd.

63. Thus, during this four-day trip to the United States, TOKUNBO spent one day personally structuring a total \$14,460.00 of cash into four different bank accounts, at four different branches, for three different banks. He also sent a wire transfer out of the country for an amount similar to the cash deposited. This type of illegal structuring activity is consistent with the activity detailed above in his four BofA accounts.

4. Structuring by Known and Unknown Coconspirators

64. Branch and ATM surveillance photos and video obtained from BofA of individuals making cash deposits into TOKUNBO and COCONSPIRATOR 1's bank accounts disclose that there have been approximately 15-30 different individuals making deposits into the accounts. Because the deposits were almost always structured under \$10,000, BofA did not collect identification of the individuals making the deposits.

65. However, one of the depositors was identified. Law enforcement received information that on December 10, 2014, Coconspirator 3 made a structured deposit of \$9,900.00 into TOKUNBO's BofA account ending in 4021 at a branch located in Queens, NY. During the same transaction, Coconspirator 3 made a structured deposit of \$8,000 in TOKUNBO's account

ending in 5080. These transactions were captured on BofA surveillance video. During the transaction, Coconspirator 3 looked at his cell phone prior to conducting the first deposit. He then stepped away from the counter and re-entered the camera's view and was talking on his cell phone for the remainder of the transaction. Your affiant is aware that persons working as money couriers or smurfs are typically directed by the structuring coconspirators how to make deposits. This can entail the coconspirators directing the couriers or smurfs over the phone, via email or text, or voice call, on what amount of funds to deposit and into which accounts. Your affiant further notes that Coconspirator 3 previously has been arrested for a fraud related scheme.

66. Other individuals of interest to the investigation made cash deposits at different locations, on the same day, within a short amount of time. Based on my training and experience, such activity is indicative of structuring and concealment, which must have been orchestrated and communicated for more than one person to execute, consistent with a structuring conspiracy. As examples:

- a. Unidentified Black Male #2 made two \$10,000.00 cash deposits into TOKUNBO's account ending in 4021 at two different Brooklyn area BofA branch locations within an hour on March 3, 2015. For the same account that day, Unidentified White Male #1 made an \$8,000.00 cash deposit at one Brooklyn branch and then a \$3,800.00 cash deposit at a different branch approximately 80 minutes later. None of these deposits by themselves exceeded \$10,000, but the aggregate did.
- b. Unidentified White Male #1 was identified as making three \$10,000.00 cash deposits into TOKUNBO's account ending in 5080 at three different Brooklyn area BofA branches on March 11, 2015, within approximately 90 minutes.
- c. Money Courier 2 made \$9,500.00 cash deposits into TOKUNBO's BofA accounts ending in 4021 and 5080 on March 3, 2015 at the same time (*supra* at ¶32).

67. There are instances where individuals made deposits into more than one of the four BofA accounts of TOKUNBO and COCONSPIRATOR 1. On some occasions, a courier would first deposit funds into TOKUNBO's accounts, and then later into COCONSPIRATOR 1's accounts. This further indicates coordination and communication between TOKUNBO, COCONSPIRATOR 1, and the individuals making deposits into the BofA accounts. As examples:

- a. On October 27, 2014, Unidentified Black Male #3 made a \$5,000.00 cash deposit into each of TOKUNBO's two BofA accounts within a couple of minutes.
- b. On March 20, 2015, Unidentified Black Male #11 deposited a \$4,000.00 cash deposit into TOKUNBO's account ending in 5080, at a Mitchellville, MD BofA branch.

Then on April 21, 2015 he made a \$5,000.00 cash deposit in to COCONSPIRATOR 1's account ending in 9322 at a BofA branch in Hyattsville, Maryland.

68. On February 13, 2015, Unidentified Black Female #3 made a \$5,000.00 cash deposit into TOKUNBO's account ending in 5080 at a Silver Spring, MD, BofA branch and then a \$6,200.00 cash deposit into the same account approximately two hours later. During both deposits, surveillance photos show an individual whom law enforcement believes resembles COCONSPIRATOR 1 standing next to the female as she conducts the transactions. Travel records indicate COCONSPIRATOR 1 was present in the United States on this day, but TOKUNBO was not.

5. TOKUNBO's Travel to Washington, D.C. Metro Area and Connection to Coconspirator 2

69. Your Affiant obtained travel records from U.S. Customs for TOKUNBO, which showed the following entries into United States for 2015:

- a. On March 15, 2015, he flew from London, U.K., to Houston, TX. On March 24, 2015, he flew from Houston, TX, to London, U.K.
- b. On April 19, 2015, he flew from London, U.K., to Baltimore, MD. On April 25, 2015, he flew from Dulles, VA, back to London, U.K.
- c. On April 30, 2015, he flew from London, U.K., to Dulles, VA. On May 8, 2015, he flew from Dulles, VA, to London, U.K.
- d. On June 17, 2015, he flew from London, U.K., to Dulles, VA. On June 20, 2015, he flew from Dulles, VA, to London, U.K.
- e. On July 27, 2015, he flew from London, U.K., to Baltimore, MD. On July 31, 2015, he flew from New York, NY, to London, U.K.
- f. On September 6, 2015, he flew from London, U.K., to New York, NY. On September 7, 2015, he flew from New York, NY, to London, U.K.

70. Coconspirator 2 is the owner of the single family residence at 10012 Birdie Lane, Upper Marlboro, MD, which is one of three addresses listed on the public website for Abbey Lincoln, TOKUNBO and COCONSPIRATOR 1's business (referenced above).

- a. When TOKUNBO arrived in the United States on June 17, 2015, he indicated on a Customs form that his destination address was 10012 Birdie Lane, MD (Coconspirator 2's house).
- b. When TOKUNBO arrived in the United States on July 27, 2015, he rented a car and went to 10012 Birdie Lane, MD (Coconspirator 2's house).
- c. When TOKUNBO arrived in the United States on February 1, 2016, he rented a car and again went to 10012 Birdie Lane, MD (Coconspirator 2's house). While being questioned by Customs Border Protection officers, TOKUNBO stated that he was staying at his cousin's residence.

71. On June 21, 2015, law enforcement conducted a trash pull at 10012 Birdie Lane. Law enforcement found the following items:

- a. A T-mobile flyer addressed to Abisdoun Awoleye, Abbely Lincoln LLC, 10012 Birdie Lane, Upper Marlboro, MD;
- b. An empty Fed-Ex envelope addressed to TOKUNBO with the address of 10012 Birdie Lane;
- c. An account closure letter from Bank of America addressed to TOKUNBO for his BofA Account ending 4021;
- d. Account statements as follows:
 - i. A BofA account statement for account ending 4021 for the period of March 24, 2015 to April 22, 2015. The statement reflects \$206,430.00 in deposits/additions into TOKUNBO's account, and \$228,468.89 (largely wires) out of this account.
 - ii. A BofA Account statement for account ending 4021 for the period of March 10, 2015 to April 8, 2015. The statement reflects \$320,868.23 in deposits/additions into TOKUNBO's account, and \$326,389.32 (largely wires) out of this account.
 - iii. Your affiant notes that this large volume of structured cash deposits into these accounts, followed by a rapid large volume of wires out, in such a short time

frame (one month) is consistent with a conduit account gathering funds by illegal structured deposits. The rapid movement out is in part to prevent law enforcement from seizing structured funds once in the conduit account.

- e. A Wells Fargo ATM receipt for a cash deposit of \$100 into TOKUNBO's account, which occurred on June 18, 2015.
- f. Paper wire receipts summarized as follows:

| <u>Bank</u> | <u>Account Owner</u> | <u>Wire Amount</u> | <u>Wire Date</u> | <u>Wire Recipient</u> | <u>Memo</u> |
|--------------------|-----------------------------|---------------------------|-------------------------|---------------------------------------|---------------------------|
| Wells Fargo | TOKUNBO | \$30,000 | April 21, 2015 | Rughani Borthers in Mumbai, India | purchase of textile goods |
| HSBC | TOKUNBO | \$34,000 | April 28, 2015 | Rughani Borthers in Mumbai, India | purchase of textile goods |
| Wells Fargo | TOKUNBO | \$9,950.00 | June 19, 2015 | Zhejiang Shangsen Ind Trade Co. LTD | purchase of textile goods |
| Wells Fargo | TOKUNBO | \$19,950.00 | June 18, 2015 | HK G SNA Company Limited | |
| Wells Fargo | TOKUNBO | \$19,950.00 | June 18, 2015 | Glorious Assests Limited in Hong Kong | |
| Citibank | TOKUNBO | \$9,950.00 | June 18, 2015 | Guniess INT Trading CO LTD in China | |

Based on my training and experience, I am aware that persons in conspiracies involving financial crimes often rely on couriers or smurfs to make deposits into conduit accounts, after which wires are sent out to foreign jurisdictions. The above receipts reflect wires out of TOKUNBO's accounts made before and after his arrival into the United States. Your affiant believes that these receipts reflect wires made out of conduit accounts after being funded, in part, by structured deposits.

72. On July 28, 2015, TOKUNBO conducted transactions at a Citibank branch, a Capital One branch, and two different Wells Fargo branches, before returning to Coconspirator 2's residence for the evening.

73. Coconspirator 2 is the owner of BofA account ending in 7907.

- a. On March 17, 2015, \$20,000.00 was wired from his account to TOKUNBO's BofA account ending in 4021. Your affiant notes, that this \$20,000.00 was sourced to a transfer from the previous day from Coconspirator 2's account ending in 0400 to this account in 7907. That same day, five wire transfers totaling \$79,910.00 were made from TOKUNBO's account to accounts in China.

- b. On June 17, 2015, TOKUNBO arrived into Dulles from London. On June 19, 2015, a check appearing to be signed by Coconspirator 2 was issued to TOKUNBO in the amount of \$3,000.00. The check was deposited into TOKUNBO's Citibank account ending in 0821 on the same day via an ATM deposit in Maryland along with a \$4,200.00 cash deposit. Approximately 90 minutes later, \$3,800.00 in cash was deposited into the same Citibank ATM. On June 22, 2015, there was an additional wire transfer of \$3,275.00 from this same Coconspirator 2 account (7907) into the same TOKUNBO Citibank account. Continuing that day, there was a \$19,950.00 wire to Hong Kong from TOKUNBO's Citibank account. This wire was funded in part by the above referenced deposits/wires from Coconspirator 2.
 - c. This account receives Coconspirator 2's United States federal government bi-weekly salary, via direct deposit, of approximately \$1,400.00
74. Law enforcement discovered additional wires from a BofA account ending in 0400, which listed Coconspirator 2 as wire originator.
- a. On March 6, 2015, there was a wire of \$20,000.00 from this account to TOKUNBO's BofA account ending in 4021. On the same day, \$19,955.00 was wired from TOKUNBO's account to an account in China.
 - b. On March 31, 2015, there was a wire of \$19,725.00 from this account to TOKUNBO's BofA account ending 4021. The following day \$19,500.00 was transferred from TOKUNBO's BofA account ending in 4021 to a BofA account ending in 5080, after which \$19,955.00 was wired from BofA account ending 5080 to an account in India.
 - c. This account had many transfers back and forth with Coconspirator 2's BofA account ending in 7907. As your affiant stated above, such rapid movement of the funds between accounts is often undertaken to layer transactions to subvert law enforcement from discovering illegal activity.
 - i. From January 2014 to May 2015 there were approximately 40 transfers out of this Coconspirator 2 account to Coconspirator 2's BofA account ending in 7907, totaling nearly \$80,000.

- ii. From January 2014 to May 2015 there were approximately 44 transfers into this Coconspirator 2 account from Coconspirator 2's BofA account ending in 7907, totaling nearly \$146,000.

75. On July 30, 2015, law enforcement conducted a second trash pull at the Target Residence. Agents found the following items:

- a. A Verizon flyer addressed to Coconspirator 2; and
- b. A Virgin Atlantic E-ticket for Coconspirator 2.

76. Law enforcement conducted surveillance of TOKUNBO during his trip to the D.C. metro area beginning on February 1, 2016.

- a. On February 2, 2016, TOKUNBO departed the Target Residence and traveled to Business 1, located at 6492 Landover Rd, Landover, MD (further described below).
- b. Continuing in the early afternoon, TOKUNBO entered a TD Bank branch located in New Carrollton, MD. TOKUNBO exited the TD Bank branch shortly thereafter.
- c. TOKUNBO next traveled to a Citibank branch located in Mitchellville, MD, where he deposited \$9,700.00 into his Citibank account ending in 9930. TOKUNBO also deposited a \$9,800.00 check from STFS to "Abbey Lincoln LLC". The check appears to bear Coconspirator 5's signature and a memo of "payment."
- d. Later that afternoon, TOKUNBO returned to Business 1. Law enforcement observed TOKUNBO and Coconspirator 2 in the parking lot. The two persons then entered Business 1 together.
- e. Later that evening, TOKUNBO picked up Coconspirator 2 from the Largo Town Center metro station. TOKUNBO drove to several places including Business 1. Ultimately TOKUNBO traveled back to the Target Residence.
- f. Your affiant notes that the most recent behavior supports necessity for searching the residence. Doing so will allow your affiant to collect financial documents that are related to the multiple bank branches TOKUNBO was seen traveling to.

77. In April 2015, the registered agent of Abbey Lincoln LLC was changed with the State of Maryland from TOKUNBO to Coconspirator 2. On July 29, 2015, law enforcement agents observed TOKUNBO enter the State of Maryland Office Building in Baltimore, Md. Records show that on July 29, 2015 at 12:23 pm, the registered agent was changed back to TOKUNBO.

TOKUNBO exited the building at 12:41 pm. On the paperwork for both changes, both parties used 10012 Birdie Lane as their address.

6. TOKUNBO's Connection to Coconspirator 5 and Business 1

78. Coconspirator 5" is listed with the state of Maryland as the owner of Business 1 in Cheverly, Maryland. During TOKUNBO's visit to the United States from July 27 to 30, 2015, and again on February 2, 2106 law enforcement observed TOKUNBO make three trips to Business 1 in between visits to different financial institutions. Coconspirator 5 held at least six bank accounts and had financial transactions with TOKUNBO and COCONSPIRATOR 1. During the period January 2014 through April 2015, Coconspirator 5's accounts made approximately 21 transfers totaling \$388,449.00 into TOKUNBO's two BofA accounts. A \$10,000.00 check transfer from Coconspirator 5's account was also deposited into TOKUNBO's BofA account ending in 4021. COCONSPIRATOR 1's BofA account ending in 9322 received a \$20,000.00 transfer from Coconspirator 5's account.

7. Bank of America – International Wires

79. TOKUNBO and COCONSPIRATOR 1's BofA accounts appear to have functioned as conduits to collect cash throughout the United States and then transfer the money to bank accounts overseas. TOKUNBO and COCONSPIRATOR 1's BofA accounts combined to conduct approximately 124 outgoing wires totaling \$1,902,495.51. Nearly all of these wires were sent out of the United States to places such as China, Vietnam, Hong Kong, Lithuania, India, Indonesia, Thailand, the United Kingdom, and South Korea.

| Summary of Known International Wires Out TOKUNBO & COCONSPIRATOR 1 Bank of America Accounts For the Period January 2014 through April 2015 | | | | |
|---|----------------|------------------|--------------------------|--------------------|
| Month | Country | Frequency | Country Total | Month Total |
| September 2014 | Lithuania | 1 | \$8,030.00 | \$8,030.00 |
| December 2014 | United Kingdom | 1 | 16,102.35 | 36,126.35 |
| | Vietnam | 2 | 20,024.00 | |
| January 2015 | China | 8 | 80,084.00 | |
| | Hong Kong | 2 | 15,881.00 | |
| | Thailand | 1 | 10,012.00 | |

| | | | | |
|---------------|----------------|-----------|------------|-----------------------|
| February 2015 | Vietnam | 1 | 9,012.00 | 114,989.00 |
| | China | 15 | 229,920.00 | |
| | Hong Kong | 4 | 50,080.00 | |
| | Thailand | 6 | 99,730.00 | |
| | United Kingdom | 1 | 938.16 | 380,668.16 |
| March 2015 | China | 34 | 586,762.00 | |
| | Hong Kong | 3 | 50,080.00 | |
| | India | 1 | 19,950.00 | |
| | Indonesia | 4 | 79,865.00 | |
| | Thailand | 4 | 79,820.00 | |
| | United Kingdom | 1 | 20,000.00 | 836,477.00 |
| April 2015 | China | 4 | 72,310.00 | |
| | Hong Kong | 3 | 54,865.00 | |
| | India | 1 | 19,955.00 | |
| | Indonesia | 1 | 19,950.00 | 167,080.00 |
| Total | | 98 | | \$1,543,370.51 |

80. Notably, the following entities received transfers from both TOKUNBO and COCONSPIRATOR 1:

| Recipient Entity | Entity Location | Receiving Bank | Combined Frequency | Combined Total |
|-------------------------------------|--------------------|--|--------------------|----------------|
| PT Golden Prima Classindo | Jakarta, Indonesia | PT Bank Central Asia Lt | 5 | \$99,815 |
| HK G-Sna Company Limited | Mongkok, Hong Kong | Hong Kong and Shanghai Banking Corporation | 10 | 144,930 |
| Hangzhou Paradise Import & Export C | Zhejiang, China | Shanghai Pudong Development Bank | 7 | 139,685 |
| Luohe Ronghui Human Hair Product Co | Zhengzhou, China | China Construction Bank Corporation | 3 | 39,865 |
| Total: | | | 25 | \$424,295 |

81. From my training and experience, I know that structurers and money launderers engage in “layering” in an attempt to conceal their funds from detection by law enforcement. Layering typically involves carrying out multiple layers of financial transactions to separate funds from their source and to disguise the audit trail. Layering can involve transactions such as the wire

transfer of deposited cash, the operation of numerous bank accounts, the conversion of deposited cash into monetary instruments (cashier's checks), and the use of shell companies. The above facts demonstrate a repeated series of layered transactions.

82. During 2014 and 2015, TOKUNBO and COCONSPIRATOR 1 had signature authority on at least 20 combined bank accounts. Of the 20, 18 were opened during 2015 and some accounts on the same days. They had signature authority on bank accounts at BofA, Capital One, Citibank, HSCB, and Wells Fargo. These accounts, although to a lesser extent, also had what appear to be cash deposits structured not to exceed \$10,000.00 at branches throughout the country and wire transfers to entities outside of the United States.

V. CONCLUSION

83. I submit that the facts herein show TOKUNBO conspired with COCONSPIRATOR 1 and others to structure cash deposits, including funds illegally obtained through fraud. Special Agent Camp (impersonating Money Courier 1), Money Courier 2, Money Courier 3, and Money Courier 4 were each instructed to make deposits of fraudulently obtained funds into TOKUNBO's BofA accounts. TOKUNBO, as sole signatory, should have been in control of his two BofA accounts and associated with COCONSPIRATOR 1's two BofA accounts. Your affiant does not believe that any reasonable person would use their account to the extent TOKUNBO did without being aware of the volume of deposits, the type and amount of deposits, and the timing of the deposits. TOKUNBO's awareness of the activity in his accounts is further demonstrated by the quick turnaround time for an outgoing international wire after a series of structured deposits. Furthermore, your affiant can conclude that no reasonable person would continue to use their account or allow it to stay open if they did not approve of the activity, especially after the activity caused accounts to be repeatedly shut down. TOKUNBO and COCONSPIRATOR 1's own attempts to personally structure cash deposits into their accounts demonstrate knowledge of the reporting requirements and their direct involvement in the structuring conspiracy.

84. In summary, based upon the above facts and information, I submit that there is probable cause to believe that TOKUNBO violated 31 U.S.C. §§ 5324(a)(1) and(a)(3) by structuring transactions to evade reporting requirements, and 18 U.S.C. § 371 by entering into an agreement with other persons to structure cash deposits into his accounts. Accordingly, I respectfully request that a criminal complaint be issued.

Christopher Janczewski, Special Agent
Internal Revenue Service
Criminal Investigation

Subscribed and sworn to
before me this ____ day of February, 2016

The Honorable ALAN KAY
Magistrate Judge for the District of Columbia